

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 1:21-md-03010 (PKC)

Singh v. Google LLC, No. 1: 23-cv-03651
(PKC)

**META PLATFORMS, INC.'S REPLY MEMORANDUM OF LAW
IN SUPPORT OF MOTION TO DISMISS COUNTS III AND IV
OF THE *SINGH v. GOOGLE LLC* COMPLAINT**

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October 20, 2023

The *Singh v. Google LLC* action was filed in the Central District of California on April 4, 2023 (23-cv-02539 (C.D. Cal.)) and transferred to the Southern District of New York for centralization into the above-referenced MDL on May 1, 2023 (23-cv-03651 (S.D.N.Y.)). The *Singh* Complaint is virtually identical to the Advertiser Plaintiffs' Consolidated Amended Complaint (the "Advertisers' CAC", Dkt. No. 399).

On September 8, 2023, Meta Platforms, Inc.'s ("Meta") filed a Motion to Dismiss Counts III and IV of the *Singh v. Google LLC* Complaint ("Meta's Motion to Dismiss", Dkt Nos. 628-629), incorporating by reference the arguments set forth in Meta's Motion to Dismiss the Advertisers' CAC (Dkt. Nos. 460-461, 519).

In response, Plaintiff Sunny Singh filed an Opposition to Meta's Motion to Dismiss ("Plaintiff's Opposition", Dkt. No. 637), "incorporat[ing] all the points and authorities set forth in Advertiser Class Plaintiffs' Consolidated Memorandum of Law in Opposition to Defendants Google LLC, Alphabet Inc., and Meta Platforms, Inc.'s Motions to Dismiss Counts III and IV of the Advertisers' Consolidated Class Action Complaint" (Dkt No. 491), and requesting that the Court deny Meta's Motion to Dismiss or grant Plaintiff leave to amend under Rule 15.

Accordingly, in response to Plaintiff's Opposition and in support of Meta's Motion to Dismiss, Meta incorporates herein all the arguments set forth in its Reply Memorandum of Law in Support of Motion to Dismiss Counts III and IV of Advertisers' CAC (Dkt. No. 519), and respectfully requests that the Court dismiss the *Singh* Complaint with prejudice for the same reasons set forth therein.

Dated: October 20, 2023

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